

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)

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CERTIFICATION OF C. BRETT VAUGHN IN SUPPORT OF  
PLAINTIFFS' REPLY BRIEF IN SUPPORT OF  
THEIR *DAUBERT* MOTION TO PRECLUDE DEFENSE EXPERT  
JASON O. CLEVINGER FROM OFFERING CLASS CERTIFICATION OPINIONS

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C. BRETT VAUGHN, hereby certify as follows:

I am an attorney at law within the State of Kansas with the Hollis Law Firm, P.A., and serve as a Court-appointed Member of the Plaintiffs' Executive Committee. I am fully familiar with the facts and circumstances of these actions. I make this certification in support of Plaintiffs' reply brief in support of their motion to preclude defense expert Jason O. Clevenger from offering class certification opinions.

1. Attached hereto as **Exhibit A** is a true and accurate copy of *Fentanyl Availability on Darknet Markets*, Australian Gov't Institute of Criminology (Feb 2020), marked as Exhibit 7 to Dr. Clevenger's deposition.
2. Attached hereto as **Exhibit B** is a true and accurate copy of APL-MDL-2875-0023627 at 3744.
3. Attached hereto as **Exhibit C** is a true and accurate copy of ZHP01812101.
4. Attached hereto as **Exhibit D** is a true and accurate copy of APL-MDL 2875-2803459, marked as Exhibit 14 to Dr. Clevenger's deposition.

5. Attached hereto as **Exhibit E** is a true and accurate copy of APL-MDL-2875-0043908 at 909.
6. Attached hereto as **Exhibit F** is a true and accurate copy of APL-MDL-2875-0102832, marked as Exhibit 17 to Dr. Clevenger's deposition.
7. Attached hereto as **Exhibit G** is a true and accurate copy of APL-MDL-2875-0076155, marked as Exhibit 20 to Dr. Clevenger's deposition.
8. Attached hereto as **Exhibit H** is a true and accurate copy of APL-MDL 2875-2721857.
9. Attached hereto as **Exhibit I** is a true and accurate copy of Auro-MDL-2875-0020779.
10. Attached hereto as **Exhibit J** is a true and accurate copy of Auro-MDL-2875-0104586, marked as Exhibit 18 to Dr. Clevenger's deposition.
11. Attached hereto as **Exhibit K** is a true and accurate copy of APL-MDL-2875-0024066.
12. Attached hereto as **Exhibit L** is a true and accurate copy of APL-MDL-2875-1515785.
13. Attached hereto as **Exhibit M** is a true and accurate copy of Auro-MDL-2875-0105928, marked as Exhibit 16 to Dr. Clevenger's deposition.
14. Attached hereto as **Exhibit N** is a true and accurate copy of APL-MDL-2875-013547, marked as Exhibit 25 to Dr. Clevenger's deposition.
15. Attached hereto as **Exhibit O** is a true and accurate copy of Auro-MDL-2875-0020672.
16. Attached hereto as **Exhibit P** is a true and accurate copy of PRINSTON00144343 at 44.

Dated: June 16, 2022

By: /s/ C. Brett Vaughn  
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